

500 Lee Rd, Suite 200 Rochester, NY 14606 (585) 563-1850

911 Compliance Letter EB Docket 04-36 EB Docket 05-196 Filer ID 826998 FRN 0015949969

March 17, 2008

Attention: Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW Suite TW-A325

Washington, DC 20554

Enclosed: 911Compliance Letter

Attachment A Attachment B

Distribution: (4 each) Marlene H. Dortch, Office of the Secretary, Federal

Communications Commission, 445 12th Street, SW, Suite TW-A325,

Washington, DC 20554

(1 each) Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Federal Communications Commission, Room 7-C802, 445 12th Street,

SW, Washington, DC 20554

(1 each) Janice Myles, Competition Policy Division, Wireline Competition Bureau, Federal Communications Commission, Room 5-C140, 445 12th

Street, SW, Washington, DC 20554

(1 each) Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402,

Washington, DC 20554

Comment: OneStream Networks began offering VoIP Services in 2007 and recently

Applied for a Filer ID as a VoIP Services provider. The filer ID above has been issued, but is not, as of the date of this letter, posted by the FCC.

Please advise if further information is required for 911 compliance.

No. of Contracts of 3



500 Lee Rd, Suite 200 Rochester, NY 14606 (585) 563-1850 www.onestreamnetworks.com

911 Compliance Letter EB Docket 04-36 and EB Docket 05-196

March 17, 2008

The undersigned Aubrey D. Smith III (Trey) is President of OneStream Networks, LLC and provides this Letter of 911 Compliance.

OneStream Networks, LLC is now providing limited Voip Services through its ISP business. Recently, Filer ID 826998 was assigned to FRN 0015949969 for filing, reporting and compliance purposes.

Our company's 911 solution is provided through a third party provider, 911 Enable, a Division of Connexon Telecom, Inc. This third party provider is directly connected to our VoIP platform to provide 100% coverage to our intended customer base. <u>Please see</u> Addendum A, attached.

We do not permit end-point users to "opt-out" of 911 calling capability, and we provide customer service support to update any change of location as required by an end-user instantly through our customer service department.

Our 911 design sends all 911 calls to the appropriate PSAP automatically, as available; and provides operator assisted support in the event of a PSTN or PSAP anomaly; with three-way transfer and hand-off to the appropriate PSAP.

OneStream Networks is able to provide 911 service within all areas that we currently intend to provide VoIP services in.

OneStream Networks currently provides commercial VoIP services only. As a standard practice, physical location information is collected during the site-survey process for the purpose of configuring 911 properly. The physical location/end-point relationship is maintained in a database and may be updated upon customer need. To date, 100% of the end-points are assigned a physical site address for 911 purposes.

As a standard document within our customer contract booklet, OneStream requires a customer-signed form that clearly articulates the mutual responsibilities and risks

associated with relocating a VoIP end-point to a different physical site address; and its potential impact on 911 functionality. This document is kept on file at our service bureau. Further 911 information as it relates to nomadic use is provided on the customer's signed Service Agreement. Please see Addendum B, attached.

Via a secure portal, provided by Connexion Telecom, Inc., our service representatives set up, test, and; as required, change the physical address/ANI association to ensure consistent and ongoing reliability of the 911 service. Any end-user may call our customer service department, at any time from their existing VoIP Telephone to instantly update their physical location as required.

As the Connexion platform is privately interfaced to our VoIP platform via a private network connection, reliable ANI or pseudo-ANI is provided instantly for 100% of the 911 calls placed.

For nomadic use, the 911 service bureau provides a warm-transfer of the call to the appropriate PSAP. The operator remains engaged until the appropriate authority is in command.

Name of Officer

Aubrey D. Smith III (Trey)

Officer of OneStream Networks, LLC

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Addendum A, provided by Connexon Telecom, Inc.



Division of Connection Talecons Inc 5101 Buchen, Suite 510 Montreal, Quebec, Canada, 1H4P 2R9

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Small; info@91 I enable com www.\$11enable.com

FCC VoIP 911 COMPLIANCE STATUS REPORT

Provision of Compliant 911 Service:

 The STATUS Tab in the SYSTEM MANAGER section indicates in realtime the number of total subscribers, and the breakdown between those with Enhanced and ten digit call routing.

911 Coverage:

- Through an agreement with Telecommunication Systems (TCS), 911
 Enable is interconnected to a large number of regional ALI databases and stand alone ALIs (SALI).
- 911 Enable uses the Level 3 footprint for access to Selective Routers.
- o We have included a spreadsheet that details Enhanced 911 coverage service as of March 30, 2007. 911 Enable currently covers over 70% of the U.S. population with Enhanced 911 service. The remaining PSAPs are covered by using a ten digit administrative line.
- Additional PSAPs are added regularly to the E911 coverage by establishing ALI connectivity with compatible PSAPs, and opening up new selective rousers.

• 911 Routing Information/Connectivity to Wireline B911 Network:

- All calls that have Selective Router access are delivered to the correct PSAP using the NENA i2 standard, which includes the call back number and location
- o 911 Basble routes calls according to the NENA i2 standard to deliver the emergency call to the correct PSAP for the address specified. 911 Enable has an emergency routing database (ERDB) that maps the phone's location information to the correct PSAP. The data in the ERDB is continuously collected and maintained. The ERDB is built using enhanced GIS technology that stores geospatial boundary data for PSAPs and emergency service zones.

Addendum B: Customer 911 Information Form



Emergency 911 Advisory

The U.S Federal Communications Commission (FCC) has mandated that customers using VoIP services must comply with the same 911 emergency contact requirements that apply to customers using traditional telephone service.

The FCC has imposed the following 911 requirements:

- VoIP service providers may not allow their customers to "opt-out" of 911 service.
- Before a VoIP service provider can activate a new customer's service, the provider must obtain from the customer the accurate physical location at which the service will be first used, so that emergency services personnel will be able to locate any customer dialing 911.
- By transporting, or relocating your OneStream Networks VoIP telephone or adapter to a physical location other than the physical street address on record with OneStream Networks, your 911 service may <u>NOT</u> function correctly. Customers must update the physical location they have registered with the VoIP provider, if it changes.
- VoIP service providers must make available labels to customers instructing them to provide notification of physical location update if the VoIP telephone is moved to an alternate location. Customer's responsibility is to affix the label to the VoIP telephone.

Please contact OneStream Networks Support for labels as required.

Support@onestreamnetworks.com 1-800-869-0315 option 1

SAMPLE		
Acknowledged, Customer Representative	Date	